

FILED

DEC 11 2013

U. S. DISTRICT COURT
E. DIST. OF MO.
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIC WILLIAMS,
a.k.a., ERIC WILLIAMS, JR.

Defendant.

No.

4:13CR511 JAR/TIA

INDICTMENT

COUNT ONE

FOOD STAMP FRAUD

The Grand Jury charges that:

Background of the Supplemental Nutrition Assistance Program (SNAP)

1. The United States Department of Agriculture (USDA) administers a program called the Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program. During all relevant times alleged herein the Food Stamp Program and SNAP helped qualifying individuals and families buy food.

2. SNAP benefits are typically issued to certified recipients and encoded electronically onto Electronic Benefits Transfer cards (hereinafter referred to as "EBT cards"). The Food and Nutrition Service (hereinafter "FNS"), an Agency of the USDA, administers the SNAP.

FNS delegates to individual States the task of determining eligibility and certifying individual SNAP recipient's eligibility. Issued on a monthly basis to eligible applicants, SNAP benefits permit the recipient to purchase only eligible food items using EBT cards at FNS authorized retailers. The FNS authorizes certain grocery retail stores to accept SNAP EBT cards from authorized recipients for eligible food items. The SNAP EBT card system is a computer-based system through which the SNAP benefit authorization is received from a central computer through the "point-of-sale" (POS) terminal located at each individual retailer. When the recipient presents the EBT card to the retailer to pay for eligible food items, the retailer uses the POS, which electronically withdraws, or debits available SNAP benefits from the recipient's EBT card and account. The grocery retailer later receives a bank deposit credit for the value of the transaction in the retailer's designated business bank account. Payments to the grocery retailer are made through the FNS system and are paid by the United States through USDA appropriated funds.

3. Individuals who have been convicted in a Federal or State court of a felony committed after August 22, 1996 related to illegal possession, use, or distribution of a controlled substance are ineligible for EBT food stamp benefits.

4. A potential SNAP/food stamp recipient must disclose in an interview with the Missouri Department of Social Services whether they have been convicted of a drug offense after August 22, 1996.

Defendant's Felony Drug Conviction and False Statements

5. On or about July 27, 2001, defendant Eric Williams, a.k.a. Eric Williams, Jr. (defendant) was convicted in the state of Missouri, in the Circuit Court for the City of St. Louis, of a felony conviction related to illegal possession, use, or distribution of a controlled substance, to

wit, the charge of Possession of Controlled Substance in case number 9811267.

6. On or about May 7, 2009, within the Eastern District of Missouri, defendant applied for SNAP/food stamp benefits in an interview with the Missouri Department of Social Services. In his interview, defendant falsely stated that he had not been convicted in a Federal or State court of a felony committed after August 22, 1996 related to illegal possession, use, or distribution of a controlled substance. Defendant also signed the "Interview Summary" affirming that the responses he provided in the interview were true, accurate and complete.

7. In or about May 2009, defendant was approved for SNAP/food stamp benefits and began to receive these benefits.

8. From approximately in or about May 2009 to in or about February 2012, defendant redeemed approximately \$4,826.00 in SNAP/food stamp benefits.

9. From in or about May 2009 to in or about February 2012, within the Eastern District of Missouri, the defendant, Eric Williams, knowingly and intentionally used, transferred, acquired and possessed SNAP/food stamp benefits of between \$100 and \$4,999, in a manner contrary to Chapter 51 of Title 7, United States Code, in that: defendant was not eligible to obtain SNAP/food stamp benefits because defendant was convicted in a Federal or State court of a felony committed after August 22, 1996 related to illegal possession, use, or distribution of a controlled substance and acquired and redeemed approximately \$4,826.00 of SNAP/food stamp benefits.

In violation of Title 7, United States Code, Section 2024(b), and Title 18, United States Code, Section 2.

COUNT II
(FALSE STATEMENT)

The Grand Jury further charges that:

1. The Grand Jury re-alleges as if fully set forth herein, all of the allegations contained in paragraphs 1-8 of Count I.

2. On or about May 7, 2009, in the Eastern District of Missouri, and elsewhere,

ERIC WILLIAMS,
AKA, ERIC WILLIAMS, JR.

did knowingly and intentionally make a false statement of material fact relating to a matter within the jurisdiction of the United States, to wit: he stated in an interview for Supplemental Nutrition Assistance Program (SNAP)/food stamp benefits, that he had not been convicted in a Federal or State court of a felony committed after August 22, 1996 related to illegal possession, use, or distribution of a controlled substance in violation of Title 18, United States Code Section 1001(a)(2).

In violation of Title 18, United States Code, Section 1001.

A TRUE BILL.

FOREPERSON

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Assistant United States Attorney